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DIANE BROWN; KIERRE TOWNSEND

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FOLLOWING PAGES]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

DIANE BROWN; KIERRE TOWNSEND,  
on behalf of themselves, all others similarly  
situated,

Case No. 13-04975 JST

ASSIGNED TO THE HONORABLE JON S.  
TIGAR

**JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE STAY PENDING SETTLEMENT**

Complaint filed: October 25, 2013

Plaintiffs,  
v.  
AIRGAS ON-SITE SAFETY SERVICES,  
INC., a Delaware Corporation; GULF  
SOUTH SAFETY CONSULTANTS, LLC,  
a Louisiana limited liability company; and  
DOES 1-50, inclusive.

#### Defendants.

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GULF SOUTH SAFETY CONSULTANTS, LLC  
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1                   Plaintiffs DIANE BROWN and KIERRE TOWNSEND (“Plaintiffs”), Defendant  
 2 AIRGAS ON-SITE SAFETY SERVICES, INC. (“AOSS”) and Defendant GULF SOUTH SAFETY  
 3 CONSULTANTS, LLC (“Gulf South”) (collectively referred to herein as the “Parties”), by and  
 4 through their respective counsel of record, hereby stipulate and agree as follows:

5                 1. WHEREAS, the Court issued an Order on May 14, 2014, staying formal  
 6 discovery and all deadlines in this case until the Parties attended private mediation in August 2014  
 7 (Dkt. No. 21);

8                 2. WHEREAS, the Court’s Order continued the Case Management Conference  
 9 previously scheduled for May 28, 2014 until September 11, 2014, at which time the stay will  
 10 dissolve (Dkt. No. 21);

11                3. WHEREAS, on August 12, 2014, the Parties attended private mediation with  
 12 mediator Mark S. Rudy in San Francisco, California, in an attempt to resolve both this current case,  
 13 as well as two related, companion cases with overlapping classes involving the Parties and currently  
 14 pending before the Honorable Elihu Behrle in Dept. 323 of the Los Angeles County Superior Court,  
 15 entitled *Louise Robinson, et al., vs. Airgas On-Site Safety Services, Inc.* (“Robinson”), and *Benjamin*  
 16 *Anderson, Francisco Maiava, et al. v. Airgas On-Site Safety Services, Inc., Gulf South Safety*  
 17 *Consultants, LLC and Responsable Staffing, LLC* (“Anderson”).

18                4. WHEREAS, following that mediation, on August 26, 2014, the Parties agreed  
 19 to the terms of a global settlement encompassing both this matter, as well as the *Robinson* and  
 20 *Anderson* matters;

21                5. WHEREAS, the Parties have agreed to a continued stay of this matter to  
 22 encompass all pending deadlines, including the upcoming Case Management Conference on  
 23 September 11, 2014, to allow the Parties to continue to finalize the terms of the settlement  
 24 documents including a formal settlement agreement;

25                THEREFORE, the Parties respectfully request this Court continue to stay all  
 26 deadlines in this case, including the deadline for submitting an updated Joint Case Management  
 27 Conference Statement, as well as the upcoming Further Case Management Conference currently  
 28 scheduled for September 11, 2014, until after the Parties have finalized the terms of their settlement.

## **IT IS SO STIPULATED.**

Dated: August 28, 2014

//s// Dennis M. Brown  
DENNIS M. BROWN  
LITTLER MENDELSON, P.C.  
Attorneys for Defendant  
AIRGAS ON-SITE SAFETY SERVICES, INC.

Dated: August 28, 2014

//s// Shaun Setareh  
SHAUN SETAREH  
SETAREH LAW GROUP  
Attorney for Plaintiffs  
DIANE BROWN; KIERRE TOWNSEND

Dated: August 28, 2014

//s// Tracy Wei Costantino  
Tracy Wei Costantino  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
Attorneys for Defendants  
GULF SOUTH SAFETY CONSULTANTS, LLC

## ORDER

Based upon the joint stipulation of the Parties in the above-captioned case, and good cause appearing, a continued stay of this case, in its entirety, is ordered to allow the Parties to finalize the terms of their settlement. The Parties shall file an updated Joint Case Management Conference Statement with the Court on or before October 2, 2014 advising the Court of the status of their settlement agreement and plan for formal approval of the class settlement. A further Case Management Conference is set for October 29, 2014 at 2:00 p.m.

## **IT IS SO ORDERED.**

**DATED:** August 28, 2014

**HONORABLE JON S. TIC**

IT IS SO ORDERED  
AS MODIFIED  
*Jon S. Tigar*  
Judge Jon S. Tigar